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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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AMEEN NAGI SALEH,	:	
File Number A91-750-886,	:	
 Petitioner,	:	 <u>ANSWER</u>
 - v. -	:	 08 Civ. 0076 (SAS) (MHD)
ANDREA J. QUARANTILLO, in her Official	:	
Capacity as District Director, U.S. Citizenship &	:	ELECTRONICALLY FILED
Immigration Services; U.S. CITIZENSHIP &	:	
IMMIGRATION SERVICES,	:	
 Respondents.	:	
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Respondents Andrea J. Quarantillo, in her official capacity as District Director, U.S. Citizenship & Immigration Services, and U.S. Citizenship and Immigration Services (“CIS”) (collectively, the “government,” or “respondents”) by their attorney, Michael J. Garcia, United States Attorney for the Southern District of New York, hereby answer the Petition for Review of Naturalization Denial (“petition”) of petitioner Ameen Nagi Saleh, File Number A91-750-886 (“petitioner” or “Saleh”), upon information and belief, as follows:

1. Neither admit nor deny the allegations in paragraph 1 of the petition because they constitute petitioner’s characterization of this action and prayer for relief, to which no response is

required; and respectfully refer the Court to the statute cited therein for an accurate statement of its provisions.

2. Neither admit nor deny the allegations in paragraph 2 of the petition, because they constitute petitioner's characterization of this action and/or conclusions of law, to which no response is required; and respectfully refer the Court to the statute cited therein for an accurate statement of its provisions.

3. Neither admit nor deny the allegations in paragraph 3 of the petition, because they constitute petitioner's characterization of this action and/or conclusions of law, to which no response is required; and respectfully refer the Court to the statutes cited therein for accurate statements of their provisions.

4. Neither admit nor deny the allegations in paragraph 4 of the petition, because they constitute petitioner's characterization of this action and/or conclusions of law, to which no response is required; and respectfully refer the Court to the statute cited therein for an accurate statement of its provisions.

5. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5 of the petition regarding petitioner's residence; neither admit nor deny the remaining allegations in paragraph 5, because they constitute petitioner's characterization of this action and/or conclusions of law, to which no response is required; and respectfully refer the Court to the statute cited therein for an accurate statement of its provisions.

6. Admit the allegations in paragraph 6 of the petition, except deny knowledge or information sufficient to form a belief as to the accuracy of the allegations regarding petitioner's residence in New York, New York.

7. Admit the allegations in paragraph 7 of the petition.

8. Admit the allegations in paragraph 8 of the petition.

9. Admit the allegations in paragraphs 9 through 15 of the petition.

10. In response to paragraph 16 of the petition, in which petitioner “refers to and incorporates” his allegations in paragraphs 1 through 15, respondents restate their responses to the allegations in paragraphs 1 through 15 of the petition.

11. Deny the allegations in paragraph 17 of the petition, and respectfully refer the Court to the statutes cited therein for accurate statements of their provisions.

12. Neither admit nor deny the allegations in paragraph 18 of the petition, because they constitute petitioner’s characterization of this action and/or prayer for relief, to which no response is required.

AS AND FOR A DEFENSE

The administrative decisions issued by CIS on May 31, 2007 and, upon further review, on December 20, 2007, denying petitioner’s naturalization application, were properly issued, were supported by substantial evidence in the record, comported with applicable law, and fell within the ambit of CIS’s broad discretion in naturalization matters.

WHEREFORE, respondent respectfully requests that this Court enter judgment dismissing the petition in its entirety, and for such other relief as the Court deems proper.

Dated: New York, New York
March 4, 2008

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